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8 *Attorney for Defendant, Liberty Stock Transfer, Inc. a New Jersey corporation*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DAVID WELLS, an individual and California
12 resident,

13 Plaintiff,

14 vs.

15 GLOBAL TECH INDUSTRIES, INC., A
16 NEVADA CORPORATION; AND LIBERTY
17 STOCK TRANSFER, INC., A NEW JERSEY
18 CORPORATION; DOES 1 THROUGH 10,
19 INCLUSIVE; ROE BUSINESS ENTITIES, 1
20 THROUGH, INCLUSIVE,

21 Defendants.

Case No.: 2:21-cv-02040-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT [ECF No. 1]**

(AMENDED FIRST REQUEST)

22 Plaintiff, David Wells ("Plaintiff"), and Defendant, Liberty Stock Transfer, Inc. a New Jersey
23 corporation. ("Liberty"), by and through their respective attorneys of records, hereby stipulate and agree
24 as follows:

- 25 1. On November 11, 2021, Plaintiff filed his Complaint in United States District Court, District of
26 Nevada, Case No. 2:21-cv-02040-GMN-NJK [ECF No. 1].
- 27 2. Liberty was served with Plaintiff's Complaint on November 16, 2021 [ECF No. 8].
- 28 3. The deadline for Liberty to respond to Plaintiff's Complaint is December 7, 2021.
4. Liberty is requesting a brief extension until December 21, 2021, to file its response to Plaintiff's Complaint.
5. This extension is requested to allow Liberty additional time to review and respond to the factual allegations and statutes cited to in the Complaint.

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6. Counsel for Plaintiff does not oppose the requested extension.

7. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 8 th day of December, 2021.	DATED this 8 th day of December, 2021.
WRIGHT, FINLAY & ZAK, LLP	ENENSTEIN PHAM & GLASS, LLP
<u>/s/ Rock K. Jung, Esq.</u>	<u>/s/ Teri T. Pham, Esq.</u>
Rock Jung, Esq. Nevada Bar No. 10906 7785 W. Sahara Avenue, Suite 200 Las Vegas, Nevada 89117 (702) 475-7964; Fax: (702) 946-1345 rjung@wrightlegal.net <i>Attorneys for Defendant, Liberty Stock Transfer, Inc. a New Jersey corporation</i>	Robert A. Rabbat, Esq. Nevada Bar No. 12633 11920 Southern Highlands Pkwy., Suite 103 Las Vegas, Nevada 89141 rrabbat@enensteinlaw.com Teri T. Pham, Esq. (<i>Pro Hac Vice Application Pending</i>) 12121 Wilshire Boulevard, Suite 600 Los Angeles, CA 90025 tpham@enensteinlaw.com <i>Attorneys for Plaintiff, David Wells</i>

ORDER

IT IS SO ORDERED.

Dated: December 9, 2021



United States Magistrate Judge